

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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February 21, 2024

**Via ECF and Email**

Honorable Dale E. Ho  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Saquan Callender  
23 Cr. 523 (DEH)**

Dear Judge Ho,

I write to respectfully request that the Court postpone the Rule 12 motions schedule and hearing date in the above-captioned case, currently set for February 26, March 27 (responses), April 10 (replies), and May 13 (hearing), respectively, for approximately 30 days. Undersigned counsel must travel out of town for a funeral, which has interfered with my ability to meet the current deadline. In addition, I need more time to meet with Mr. Callender at MDC before filing; the requested adjournment will enable me to do so.

The government, by Assistant United State Attorney Meredith Foster, consents to this request.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly-selected date.

Thank you for your consideration.  
**Application GRANTED.**

Respectfully submitted,


/s/

Sylvie Levine  
Attorney for Mr. Callender  
212-417-8729

Motions are due by 3/27/2024. Oppositions due by 4/26/2024. Replies due by 5/10/2024. The Motion Hearing is adjourned until 6/12/2024 at 3:30 PM. The Court will exclude time through 6/12/2024 from the Speedy Trial Act calculation pursuant to 18 U.S.C. § 3161(h)(7). After balancing the factors specified by statute, the Court finds that the ends of justice served by excluding such time outweigh the interests of the public and the Defendant in a speedy trial, because it will allow time for Defendant's counsel to meet and confer with the Defendant, and to consider and prepare any motions; and time for the parties to prepare for trial. The Clerk Of Court is respectfully requested to close ECF No. 25.

SO ORDERED.

Dated: February 22, 2024  
New York, New York

  
Dale E. Ho  
U.S. District Judge